MARK E. FELGER (MF9985) JERROLD N. POSLUSNY, JR. (JP7140) COZEN O'CONNOR

LibertyView, Suite 300 457 Haddonfield Road Cherry Hill, NJ 08002 (856) 910-5000 (856) 910-5075 (fax)

Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT

In re: : FOR THE DISTRICT OF NEW JERSEY

SHAPES/ARCH HOLDINGS L.L.C., et : CHAPTER 11

<u>al.</u>,

: CASE NO. 08-14631 (GMB)

Debtors. (Jointly Administered)

## APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR NOTICE OF DEBTORS' MOTION TO DISALLOW CLAIMS FOR CONTRIBUTION AND IN THE ALTERNATIVE TO ESTIMATE CLAIMS

## TO: THE HONORABLE GLORIA M. BURNS

Your applicant, Jerrold N. Poslusny, Jr., respectfully represents:

- 1. Your applicant is a member with the firm of Cozen O'Connor, attorneys for the above captioned debtors and debtors-in-possession (the "<u>Debtors</u>"). I am familiar with the facts of this case.
- 2. The Debtors have filed a motion to disallow contribution claims and in the alternative to estimate claims (the "Motion").

<sup>&</sup>lt;sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Application.

Case 08-14631-GMB Doc 389 Filed 06/20/08 Entered 06/20/08 16:29:56 Desc Main Document Page 2 of 2

3. A shortened hearing date is requested because it would be more efficient for the

administration of these cases for the Motion to be heard on the same date as the confirmation

hearing, which is scheduled for July 8, 2008 at 10:00 a.m.

4. Moreover, in the order approving the Debtors' disclosure statement in support of

the Third Amended Plan, the Court allowed the Debtors until June 20, 2008 to file objections to

claims and requests for the Court to estimate claims, established July 1, 2008 as the deadlines for

responses and ordered that any such motions would be considered at the confirmation hearing.

5. Finally, the Debtors note that the requested relief would provide parties with 18

days to respond to the Motion instead of 20 days required by the Local Rules.

6. Therefore, the Debtors submit that parties in interest will not be prejudiced by a

shortened notice period.

7. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P.

9006(c)(1) and the Rules listed therein.

WHEREFORE, your applicant requests entry of the Order submitted herewith.

Dated: June 20, 2008 COZEN O'CONNOR

By: /s/ Jerrold N. Poslusny, Jr.

Mark E. Felger

Jerrold N. Poslusny, Jr.

Attorneys for the Debtors

2